

October 14, 2022

Tony Doan
State Building Code Council Chair
1500 Jefferson Street SE
PO Box 21499
Olympia, WA 98504

Dear Chair Doan,

I am the chair of the King County Fire Marshals Wildland Urban Interface Code (WUIC) Committee, and I am submitting comments on behalf of the King County Fire Marshals Association. Our committee members and I have worked as part of the WSAFM/WABO Wildland Urban Interface Workgroup, and we strongly support the recommended code changes in the CR102 document for the Washington Wildland Urban Interface Code (WA-WUIC) dated August 23, 2022, along with the additional changes proposed by Micah Chappell in public comment dated September 28, 2022. Together, these documents elegantly unite the letter and intent of RCW 19.27.560 – Wildland Urban Interface Code, drafted by the Washington State Legislature, with the necessary context and texture to be successfully implemented by jurisdictions across Washington State.

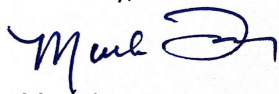
A Washington WUIC is needed immediately. As development in wildland interface areas has accelerated, our climate has become warmer and drier, causing interface areas to be more hazardous than ever before. The Legislature recognized this in 2018 and passed legislation leading to RCW 19.27.560. The RCW requires minimum wildfire resilience features for new structures and minimum access provisions for new development in the WUI.

At its core, the WUIC CR102 proposal requires the elements mandated by the Legislature in RCW 19.27.560 without exceeding the authority of the State Building Code Council (SBCC). The CR102 additionally includes scope, administration, definitions, and explanatory material from the International Code Council (ICC) Model WUI Code. Furthermore, it retains all other levels of ignition-resistant construction as options for applicants if they wish to pursue a more thorough and detailed wildfire risk assessment. Finally, Mr. Chappell's public-comment proposal clarifies questions of findings of fact in Chapter 3 and provides a means for applicants to verify a parcel's inclusion in the WUI based on criteria used by the Washington State Department of Natural Resources in creating the WUI map.

Together the CR102 and Mr. Chappell's public-comment proposal are the basis for an eminently needed Washington WUIC that can be successfully implemented by code officials throughout Washington State.

The King County Fire Marshals are grateful for the work of the Building Code Council and the opportunity to provide this public comment.

Sincerely,


Mark Jung